

July 9, 2019

**Via ECF**

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

Re: *In re: Interest Rate Swaps Antitrust Litigation*, No. 16-MD-2704 (PAE)  
*This Document Relates To All Actions*

Dear Judge Engelmayer:

Pursuant to Order No. 72 (Dkt. No. 801), Counsel for Plaintiffs and Defendants jointly submit this letter to update the Court on recent developments and identify the participants for the July 11 teleconference. Specifically, the parties want the Court to be aware of the following issues:

*First*, Plaintiffs will request a three-week extension of the deadline for their reply in support of the motion for class certification. Plaintiffs respectfully submit that this modest extension is warranted in light of: (i) the time it will take to schedule, prepare for, and take depositions of the three defense experts; (ii) the volume of materials Defendants submitted, including a nearly 100-page brief, hundreds of pages of expert reports containing dozens of new analyses and studies, and gigabytes of back-up material such as computer code, data, and discovery materials; and (iii) to accommodate previously-scheduled summer travel arrangements.<sup>1</sup> Although the proposed 21-day extension would give Plaintiffs a total of 106 days in which to submit replies, Defendants consent to that extension provided that Plaintiffs agree not to seek a further extension absent extraordinary circumstances.

*Second*, the parties will request an extension of the July 26 deadline to complete depositions of Defendants' experts to accommodate scheduling issues both for the experts and for Plaintiffs' counsel.

*Third*, Plaintiffs filed a motion to compel on July 1, which will be fully briefed as of the July 11 status conference.

**Conference Participants**

The participants for Plaintiffs will be Will Sears (Quinn Emanuel Urquhart & Sullivan LLP), Michael Eisenkraft (Cohen Milstein Sellers & Toll PLLC), and Randall Rainer (Wollmuth Maher & Deutsch LLP).

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<sup>1</sup> Plaintiffs request the same three-week extension for their opposition to Defendants' *Daubert* motion, the deadline for which was preliminarily set for the same date as the class certification reply brief by consent at the June 5 teleconference.

The participants for Defendants will be Robert Wick (Covington & Burling LLP) and Richard Schwed (Shearman & Sterling LLP).

Plaintiffs will provide the Court and Defendants with a dial-in number for the teleconference via email.

Respectfully submitted,

/s/ Daniel L. Brockett  
Daniel L. Brockett on behalf of  
Counsel for Plaintiffs

/s/ Adam S. Hakki (on consent)<sup>2</sup>  
Adam S. Hakki  
Defendants' Liaison Counsel

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<sup>2</sup> Electronic signature provided with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions